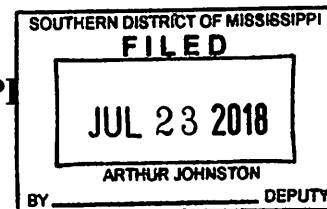


**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**



DOUGLAS HANDSHOE

v.

CIVIL ACTION NO. 1:15cv382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY &  
DANIEL ABEL, D/B/A/ TROUT POINT  
LODGE LTD OF NOVA SCOTIA & IN  
THEIR INDIVIDUAL CAPACITIES  
PROGRESS MEDIA GROUP LIMITED,  
MARILYN SMULDERS, & ASHOKA

**RESPONSE IN OPPOSITION TO DEFENDANT LEARY'S  
MOTION TO AMEND COUNTERCLAIMS (ECF# 265)**

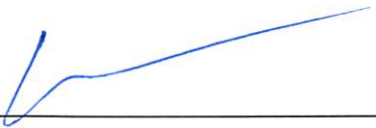
Plaintiff Douglas Handshoe respectfully submits this response in opposition to Defendant Charles Leary's Motion to Amend (ECF# 265) and he will show that Mr. Leary's Motion should be denied as a dilatory tactic, among other reasons.

Mr. Leary's Motion should be denied because of the relatively late stage of this litigation due to his previous filings being struck because he was using a third party to ghostwrite and submit them. Additionally, Mr. Leary's attempt to amend his counterclaims is nothing more than a bald-faced attempt to derail the execution of a United States Federal Court judgment in Stone County Mississippi with baseless counterclaims against Stone County Circuit Clerk Jeffrey O'Neal, Stone County Sheriff Farmer and Plaintiff's counsel in that other Federal Court matter, Mr. G.

Gerald Cruthird, Esq. Leary also seeks to add Plaintiff's wife in causes of action that are due to be dismissed as time barred or because they were not properly pleaded. Mr. Leary is both contemnor and an absconding judgment debtor currently attempting to evade service of process somewhere near or about Girona, Girona Spain. Finally, Mr. Leary's claims of racketeering and civil rights violation not only expand the instant litigation greatly, they bear no relationship to the subject matter of this litigation: Mr. Leary sending a misrepresented DMCA Takedown Notice to YouTube.

These matters are more fully discussed in the accompanying Memorandum that is contemporaneously filed with this Opposition.

Respectfully submitted this 23rd day of July, 2018,



---

Plaintiff  
Douglas Handshoe  
Post Office Box 788  
110 Hall Street  
Wiggins, MS 39577  
(601) 928-5380  
[earning04@gmail.com](mailto:earning04@gmail.com)

### **CERTIFICATE OF SERVICE**

I, Douglas Handshoe, hereby certify that on July 23, 2018 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

I, Douglas Handshoe, hereby certify that on July 23, 2018, I mailed the foregoing to Charles Leary at 308 5th Ave E, Vancouver, BC V5T 1H4 Canada with a courtesy copy to [foodvacation@gmail.com](mailto:foodvacation@gmail.com).

Respectfully submitted this 23<sup>rd</sup> day of July, 2018,



---

Douglas Handshoe  
Post Office Box 788  
110 Hall Street  
Wiggins, MS 39577  
(601) 928-5380  
[earning04@gmail.com](mailto:earning04@gmail.com)